

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: Jason E. Ritenour and Jodi L Ritenour  
a/k/a Jodi L Spillar  
Debtors,

BANKRUPTCY CASE NUMBER  
19-24856-GLT

Nationstar Mortgage LLC as servicer for  
Lakeview Loan Servicing LLC  
Movant.

CHAPTER 13

v.

Jason E. Ritenour and Jodi L Ritenour a/k/a  
Jodi L Spillar  
Debtors/Respondents,

Ronda J. Winnecour, Trustee  
Additional Respondent.

**RESPONSE OF NATIONSTAR MORTGAGE LLC AS SERVICER FOR LAKEVIEW  
LOAN SERVICING LLC TO DEBTORS' MOTION FOR APPROVAL OF SALE FREE  
AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES**

Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing LLC, by and through its counsel, LOGS Legal Group LLP, hereby responds to Debtors' MOTION FOR APPROVAL OF SALE FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES, and in support thereof, avers as follows:

1. Admitted.
2. Admitted.
3. Admitted only as to averment regarding Lakeview Loan Servicing LLC. In the absence of a current title report on the real property at 128 Braddock Drive, Latrobe, PA, Respondent is without sufficient information to form a belief as to the truth or falsity of averments regarding liens of other creditors and those averments therefore are deemed denied.
4. It is admitted only that the real property that secures repayment of the loan owed by Debtor(s) to Lakeview Loan Servicing LLC is located in Westmoreland County. The remaining averments are denied. Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing LLC is without sufficient information to form a belief as to the truth or falsity of the remaining averments, in the absence of a current title report and copy of the filed Schedules and these averments, therefore, are deemed denied.
5. It is admitted that the Application appears to have been filed and what appears to be a Standard Agreement for the Sale of Real Estate and Seller's Estimated Costs are attached.

The remaining averments are denied because Respondent is without sufficient information to form a belief as to their truth or falsity. Strict proof is demanded at hearing/trial.

6. Denied. Respondent is without sufficient information to form a belief as to the truth or falsity of the within averments and they, therefore, are deemed denied.

7. Denied. Respondent is without sufficient information to form a belief as to the truth or falsity of the within averments regarding Debtors' beliefs and they, therefore, are deemed denied.

8. Paragraph No. 8 is omitted in the Motion for Approval of Sale Free and Clear of all Liens, Claims and Encumbrances.

9. It is admitted only that Debtors' Counsel so requests. Respondent is without sufficient information to form a belief as to the truth or falsity of the remaining averments and they, therefore, are deemed denied. Strict proof at hearing or trial is demanded.

10. Denied. Respondent is without sufficient information to form a belief as to the truth or falsity of the within averments regarding Debtors' intentions and what Debtor(s) anticipate and therefore, those allegations are deemed denied.

WHEREFORE, Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing LLC respectfully requests Debtors' MOTION FOR APPROVAL OF SALE FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES be allowed only if the averments contained in the Debtors' Motion are accurate and only if the sale generates a full payoff for the lien of Lakeview Loan Servicing LLC.

/s/Lorraine Gazzara Doyle

Christopher A. DeNardo 78447

Lorraine Gazzara Doyle 34576

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**CERTIFICATE OF SERVICE**

I, Lorraine Gazzara Doyle, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of the foregoing by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on this 7th day of June, 2023:

Jason E. Ritenour  
128 Braddock Drive  
Latrobe, PA 15650

Jodi L Ritenour a/k/a Jodi L Spillar  
128 Braddock Drive  
Latrobe, PA 15650

Scott R. Lowden, Nicotero & Lowden PC  
3948 Monroeville Blvd., Suite 2  
Monroeville, PA 15146  
niclowlgl@comcast.net - VIA ECF

Ronda J. Winnecour, Trustee  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
cmecf@chapter13trusteewdpa.com - VIA ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/Lorraine Gazzara Doyle

Christopher A. DeNardo 78447

Lorraine Gazzara Doyle 34576

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of the Debtors' MOTION FOR APPROVAL OF SALE FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES and the Response of Nationstar Mortgage LLC as servicer for Lakeview Loan Servicing LLC thereto;

It is hereby ORDERED that Debtors' MOTION FOR APPROVAL OF SALE FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES be allowed upon proof of the veracity of its averments, PROVIDED THAT that the sale results in a full payoff of the loan owed to Lakeview Loan Servicing LLC.

BY THE COURT:

\_\_\_\_\_  
HONORABLE GREGORY L. TADDONIO  
UNITED STATES BANKRUPTCY JUDGE